

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE

NIKKI BOLLINGER GRAE, Individually and on Behalf of All Others Similarly Situated,	)	Civil Action No. 3:16-cv-02267
	)	
Plaintiff,	)	Honorable Aleta A. Trauger
	)	
vs.	)	SUPPLEMENTAL DECLARATION OF
	)	ROSS D. MURRAY REGARDING NOTICE
CORRECTIONS CORPORATION OF	)	DISSEMINATION AND REQUESTS FOR
AMERICA, et al.,	)	EXCLUSION RECEIVED TO DATE
	)	
Defendants.	)	
_____	)	

I, ROSS D. MURRAY, declare and state as follows:

1. I am employed as a Vice President of Securities by Gilardi & Co. LLC (“Gilardi”), located at 1 McInnis Parkway, Suite 250, San Rafael, California. Pursuant to this Court’s June 29, 2021 Order Preliminarily Approving Settlement and Providing for Notice (“Notice Order”) (ECF No. 464), Gilardi was appointed to supervise and administer the notice procedure as well as the processing of Claims in connection with the proposed Settlement of the above-captioned litigation (the “Litigation”).<sup>1</sup> I oversaw the notice services that Gilardi provided in accordance with the Notice Order.

2. I submit this declaration as a supplement to my earlier declaration, the Declaration of Ross D. Murray Regarding Notice Dissemination, Publication, and Requests for Exclusion Received to Date (the “Initial Mailing Declaration”) (ECF No. 472). The following statements are based on my personal knowledge and information provided to me by other Gilardi employees and if called to testify I could and would do so competently.

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<sup>1</sup> All capitalized terms that are not otherwise defined herein shall have the same meanings provided in the Stipulation of Settlement dated June 24, 2021 (the “Stipulation”) (ECF No. 463).

### **UPDATE ON DISSEMINATION OF THE CLAIM PACKAGE**

3. As more fully detailed in the Initial Mailing Declaration, as of September 24, 2021, Gilardi had mailed 175,699 copies of the Court-approved Notice of Proposed Settlement of Class Action (the “Notice”) and Proof of Claim and Release form (the “Proof of Claim”) (collectively, the “Claim Package”) to potential Class Members and their nominees. *See* Initial Mailing Declaration, ¶11.

4. Since September 24, 2021, Gilardi has mailed an additional 787 copies of the Claim Package in response to requests from potential Class Members, brokers, and nominees and as a result of mail returned as undeliverable for which new addresses were identified and re-mailed to those new addresses. Therefore, as of October 20, 2021, Gilardi has mailed a total of 176,486 Claim Packages to potential Class Members and nominees.

### **REQUESTS FOR EXCLUSION RECEIVED TO DATE**

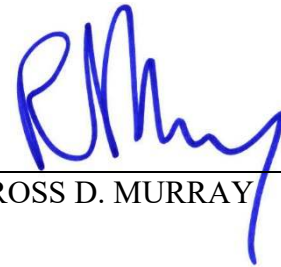
5. The Notice of Pendency of Class Action (“Notice of Pendency”) disseminated in 2020 informed potential Class Members that written requests for exclusion from the Class were to be mailed to CoreCivic, Inc. Securities Litigation, c/o Gilardi & Co. LLC, EXCLUSIONS, 150 Royall Street, Suite 101, Canton, MA 02021, such that they were postmarked no later than March 18, 2021.

6. The Notice of Pendency also set forth the information that was to be included in each request for exclusion. In response to the Notice of Pendency, Gilardi received 51 timely requests for exclusion. Additionally, Gilardi received five requests for exclusion which were postmarked after the March 18, 2021 deadline.

7. Pursuant to the Notice Order, the Notice informed potential Class Members that written requests for exclusion from the Class were to be mailed to CCA/CoreCivic Securities Settlement, c/o Gilardi & Co. LLC, EXCLUSIONS, 150 Royall Street, Suite 101, Canton, MA 02021, such that they were postmarked no later than October 8, 2021. At the time of the Initial Mailing Declaration, Gilardi had received one timely request for exclusion from the Class in connection with this Settlement. *See* Initial Mailing Declaration, ¶18.

8. Since the Initial Mailing Declaration was executed, and as of the date of this declaration, Gilardi has received two additional timely requests for exclusion and one late request for exclusion.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 20th day of October, 2021, at San Rafael, California.



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ROSS D. MURRAY

### **CERTIFICATE OF SERVICE**

I hereby certify under penalty of perjury that on October 22, 2021, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ Christopher M. Wood  
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CHRISTOPHER M. WOOD

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# Mailing Information for a Case 3:16-cv-02267 Grae v. Corrections Corporation of America et al

## Electronic Mail Notice List

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### Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)